

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DOUGLAS RICHARDS,

Defendant.

NO  
**3: CR 09 400**

FILED  
SCRANTON

DEC 10 2009

I N F O R M A T I O N

18 U.S.C. § 666(a)(1)(B)  
(Corrupt Receipt of Reward for Official Action  
Concerning Programs Receiving Federal Funds)

PER [Signature]  
DEPUTY CLERK

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this Information, the Defendant DOUGLAS RICHARDS was director of human resources for Luzerne County Pennsylvania, a local governmental agency within the meaning of federal law that received federal assistance in excess of \$10,000 during a one-year period within June 1, 2007.

As an employee of Luzerne County, DOUGLAS RICHARDS exercised discretionary decision-making authority on behalf of Luzerne County and was an agent of Luzerne County. Among other discretionary decision-making activities, DOUGLAS RICHARDS participated in the awarding of contracts on behalf of Luzerne County.

Between on or about January 1, 2006 and on or about May 1, 2008, in the Middle District of Pennsylvania, and elsewhere, the Defendant,

DOUGLAS RICHARDS,

did knowingly, intentionally and corruptly accept, and agree to accept a thing of value from another person, namely, cash in an amount of more than \$1,000, intending to be rewarded in connection

with support DOUGLAS RICHARDS provided to a contractor who entered into a contract with Luzerne County.

It was part of the offense that DOUGLAS RICHARDS, acting in his capacity as human resources director for Luzerne County, supported the efforts of a contractor who was seeking to enter into contracts with Luzerne County involving a thing of value in excess of \$5,000. It was further a part of the offense that, after DOUGLAS RICHARDS, while acting in his capacity as human resources director for Luzerne County, supported the particular contractor for the contract, the contractor paid more than \$1,000 to DOUGLAS RICHARDS to reward DOUGLAS RICHARDS for supporting the contractor's efforts to obtain contracts.

In violation of Title 18, United States Code, §  
666(a)(1)(B).

Dated: December 10, 2009

Dennis C. Pfannenschmidt (NSP)  
DENNIS C. PFANNENSCHMIDT  
UNITED STATES ATTORNEY